



U.S. Department
of Transportation
**Federal Aviation
Administration**

**Transport Airplane Directorate
Aircraft Certification Service**

1601 Lind Avenue, S. W.
Renton, Washington 98055-4056

June 29, 2001

Mr. Bradford A. Moravec
Co-Chair, Fuel Tank Inerting Harmonization Working Group
P.O. Box 3707 MS 67-WH
Seattle, WA 98124-2207

Mr. Sean B. O'Callaghan
Co-Chair, Fuel Tank Inerting Harmonization Working Group
C3 Technical Block A (S343)
P.O. Box 10 Heathrow Airport
Hounslow Middlesex TW6 2JA UK

Dear Brad and Sean:

As the FAA member of the Fuel Tank Inerting Harmonization Working Group (FTIHWG), I request that the following two changes be made to the FTIHWG report. First, insert the following paragraph in Section 1.1, Overview of the Executive Summary, of the report. This paragraph documents the previously stated FAA concerns with the assumptions and resulting conclusions in the report.

"The FAA, as a member of the FTIHWG, disagrees with certain assumptions and has questions on other assumptions used in this study. The assumptions used in the study are critical to the cost estimates provided for the fuel tank inerting options studied. Therefore, the FAA has some reservations as to the accuracy of the Working Group's conclusions expressed in this report. Those conclusions produced inerting system cost estimates in the tens of billions of U.S. dollars with relatively minor benefits from inerting for the fifteen year study period. The FAA's questions can only be answered following a full review of the data in the appendices to this report. As stated in the Task, the FAA will use the data in the report and results of independent FAA research and development programs in evaluating if a practical means of inerting fuel tanks can be found for the in-

service fleet, new production airplanes, and new airplane designs. The FAA has provided an attachment to the report with an expanded explanation of the most significant issues."

Second, insert the attached summary of the FAA concerns as an appendix or attachment to the report. I understand from my conversations with Brad Moravec on June 27, 2001, when I told him I would send this request, that a number of the reports had been printed for submittal to the Executive Committee of the Aviation Rulemaking Advisory Committee (ARAC) for their review and approval prior to issuing the report. However, I request that these changes be included in the report before it is sent to the Executive Committee. I regret submitting these changes at this late time in the process, but because the report was only finalized over the last few days I was unable to complete the FAA organizational review of the summary sections of the report any earlier. The FAA will review the full report, including the data and justifications for the assumptions that are contained in the appendices, after we receive our complete copy of the report.

If you need to discuss this further, please contact me at 425-227-2689.

Sincerely,

*Original signed
by G. Michael Collins*

G. Michael Collins,
FAA Representative,
Fuel Tank Inerting Harmonization Working Group

Attachment